

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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SAM HADAWAY,

Plaintiff,

v.

Case No. 2:19-cv-01106-PP

CITY OF MILWAUKEE, et al.,

Defendants.

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**PARTIES' STIPULATION REGARDING EXPERT DISCOVERY**

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The Parties, by and through their respective counsel, submit the following stipulation regarding setting an expert discovery schedule.

WHEREAS, the Parties have met and conferred regarding an expert discovery and reached an proposed expert discovery deadline as follows:

- Plaintiff to disclose expert reports by December 3, 2022
- Defendants depose Plaintiff's experts and disclose their experts by January 13, 2023.
- Defendants to disclose expert reports by February 27, 2023
- Plaintiffs depose Defendants' experts by April 13, 2023

WHEREFORE the Parties respectfully request that the Court enter an order setting the Parties' proposed expert discovery schedule:

- Plaintiff to disclose expert reports by December 3, 2022

- Defendants depose Plaintiff's experts and disclose their experts by January 13, 2023.
- Defendants to disclose expert reports by February 27, 2023
- Plaintiffs depose Defendants' experts by April 13, 2023

Dated: September 30, 2022

**SAM HADAWAY, Plaintiff**

/s/ Heather Lewis Donnell  
HEATHER LEWIS DONNELL  
Attorney for Plaintiff  
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**ATTORNEYS FOR DEFENDANTS**

Dates: September 30, 2022

/s/ Brian Wilson \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I, Heather Lewis Donnell, an attorney, certify that on September 30, 2022, I filed a copy of the Parties' Stipulation Regarding Expert Discovery via the Court's ECF/CM filing system and thereby served a copy of the same on all counsel of record.

/s/ Heather Lewis Donnell